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Attorneys for the City of American Canyon

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:	)	Case No.: 19-30088 (DM)
PG&E CORPORATION AND PACIFIC GAS	)	[Chapter 11]
AND ELECTRIC COMPANY,	)	Jointly Administered
Debtors.	)	Re: Docket No. 7315
	)	
	)	
	)	
	)	
	)	
	)	

**NOTICE OF QUALIFIED WITHDRAWAL OF OBJECTION AND RESERVATION  
OF RIGHTS OF THE CITY OF AMERICAN CANYON TO NOTICE OF (I)  
PROPOSED ASSUMPTION OF EXECUTORY CONTRACTS AND UNEXPIRED  
LEASES PURSUANT TO THE DEBTORS' AND SHAREHOLDER PROPONENTS'  
JOINT CHAPTER 11 PLAN OF REORGANIZATION  
AND (II) PROPOSED CURE AMOUNTS**

**PLEASE TAKE NOTICE** that, as qualified below, the City of American Canyon (the "City") hereby withdraws its objection and reservation of rights (the "Objection") to the Debtors' *Notice of (I) Proposed Assumption of Executory Contracts and Unexpired Leases Pursuant to the Debtors' and Shareholder Proponents' Joint Chapter 11*

1 *Plan of Reorganization and (II) Proposed Cure Amounts* [ECF Docket No. 7315] regarding  
2 the Debtors' assumption of:

- 3 a) City of American Canyon Electric Franchise – Ordinance No. 92-8;  
4 (the “Electric Franchise”)  
5  
6 b) City of American Canyon Gas Franchise – Ordinance No. 92-7 (the  
7 “Gas Franchise”)

8 **PLEASE TAKE FURTHER NOTICE** that the City continues to reserve all of its  
9 rights to the allowance and immediate payment of all post-petition franchise fees pursuant to  
10 11 U.S.C. 503(b).  
11

12 Dated: July 31, 2020

REEDER LAW CORPORATION

14 /s/ DAVID M. REEDER

15 DAVID M. REEDER

16 Attorneys for the City of American Canyon  
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In re  
PG&E Corporation and Pacific Gas and Electric Company,  
Debtors.

CHAPTER: 11  
CASE NO.: 19-30088 (DM)

**PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**Reeder Law Corporation  
1801 Century Park East, 16<sup>th</sup> Floor  
Los Angeles, CA 90067**

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF QUALIFIED WITHDRAWAL OF OBJECTION AND RESERVATION OF RIGHTS OF THE CITY OF AMERICAN CANYON TO NOTICE OF (I) PROPOSED ASSUMPTION OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES PURSUANT TO THE DEBTORS' AND SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF REORGANIZATION AND (II) PROPOSED CURE AMOUNTS** will be served or was served in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 31, 2020**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **July 31, 2020**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

**July 31, 2020**

**David M. Reeder**

**/s/ DAVID M. REEDER**

*Date*

*Printed Name*

*Signature*

In re  
PG&E Corporation and Pacific Gas and Electric Company,  
Debtors.

CHAPTER: 11  
CASE NO.: 19-30088 (DM)

## **SERVICE LIST**

### **Service by ECF**

All persons who have requested that they be added to the ECF service list in the Debtor's cases

### **Served by Email**

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